



RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION

FEB 17 1 39 PM '98

AMERICAN BANKERS ASSOCIATION
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036

NATIONAL BANKPAC COMMITTEE

Chairman
James F. Best
Chairman, President and CEO
Farmers & Merchants Bank
P.O. Box 220
Centre, AL 35960
(205) 927-8691

Treasurer
Gary W. Fields
(202) 663-5113
gfields@aba.com

Assistant Director
Hilary L. Horn
(202) 663-5076
lhorn@aba.com

February 17, 1998

Mr. Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463

Identification number: C00004275

Dear Mr. Davis,

In response to FEC's letter dated January 23, 1998, the American Bankers Association has requested a copy of the Georgia Bankers Association's \$500.00 refund to AmSouth Pac made in January 1998.

With this refund to AmSouth Pac by Georgia Bankers Association, the American Bankers Association and the Georgia Bankers Association should be in compliance with FEC law Act 2 U.S.C. 441a(f) and 11 CFR 110.1(d) which preclude a committee and its affiliates from receiving contributions from another political action committee or person in excess of \$5,000 per calendar year.

If you have any questions please contact me at 202/663-5076.

Thank you for your time.

Sincerely,


Hilary Horn
Assistant Director, BankPac

Attachments

cc: Elizabeth Way, Government Relations Manager, Georgia Bankers Association



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

JAN 23 1998

Gary W. Fields, Treasurer
American Bankers Association BANKPAC
1120 Connecticut Avenue NW, Suite 851
Washington, DC 20036

Identification Number: C00004275

Reference: February Monthly Report (1/1/97-1/31/97)

Dear Mr. Fields:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

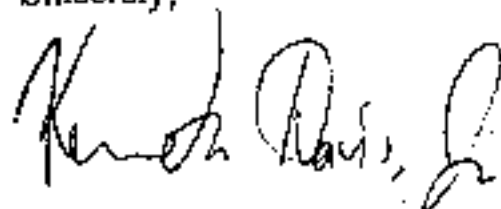
If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth A. Davis, Jr.", written in a cursive style.

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

SCHEDULE A ITEMIZED RECEIPTS

PAGE 1 OF 1
Line 11c

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full) ABA BankPac

Name/Address	Employer/Occupation	Year to Date	Date of Receipt	Amount
--------------	---------------------	--------------	-----------------	--------

Ambuth Pac
P.O. Box 11007
Birmingham, AL 35288

Ambuth Bank

01/31/1997

\$5,000.00

5,000.00

Fleet Financial Group Federal PAC
One Federal Street
Boston, MA 02110

Federal Pac

01/02/1997

\$1,000.00

1,000.00

Bank of Boston PAC
P.O. Box 2016
Boston, MA 02110

Bank of Boston Corporation

01/23/1997

\$500.00

500.00

SUBTOTAL of Receipts This Page (optional)

\$6,500.00

TOTAL This Period (last page this line number only)

\$6,500.00

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Georgia Bankers Association Political Action Committee

A. Full Name, Mailing Address and ZIP Code Am South Political Action Comm. P.O. Box 11007 Birmingham, Alabama 35228	Name of Employer Am South Bank	Date (month, day, year) 1/24/97	Amount of Each Receipt this Period \$500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>5-17-98</i>
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>SLS</i> PREPARER	<i>5-17-98</i> DATE PREPARED